

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

SIR EDWARD THOMAS, SR.,

Plaintiff,

v.

CORRECT CARE SOLUTIONS, LLC,

Defendant.

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Case No. 3:14-cv-581-REP

AFFIDAVIT OF DANIEL GOODALL

I, Daniel Goodall, under penalty of perjury, state as follows:

1. I am the Grievance Coordinator at the Richmond City Jail in Richmond, Virginia and am the custodian of all of the grievance records during the time of Mr. Thomas' incarceration from October 2011 to April 2012.

2. The statements contained in this affidavit are based on my personal knowledge and records maintained in the ordinary and regular course of business and are true and accurate.

3. I have personally reviewed the copies of purported grievances provided to me by Correct Care Solutions which are attached to this affidavit as Exhibit 1.

4. None of the grievances in Exhibit 1 are in the files maintained by the Richmond City Sheriff's Office located at the Richmond City Jail.

5. When such grievances are submitted by inmates, the originals are maintained in the files kept by the Richmond City Sheriff's Office located at the Richmond City Jail.

6. Upon receipt, the originals are date-stamped and signed by jail personnel and a log book number is entered on the grievance. A notation cross-referencing the grievance is also made in the log book.

Exhibit A

6. Upon receipt, the originals are date-stamped and signed by jail personnel and a log book number is entered on the grievance. A notation cross-referencing the grievance is also made in the log book.

7. A copy of the grievance, bearing those marks of authenticity, are then provided to the inmate for his or her records.

8. This was the protocol for handling inmate grievances at the time of Mr. Thomas' incarceration and has continued to the present.

9. The copies of the grievances in Exhibit 1 do not bear any of the marks of authenticity that would demonstrate that they had ever been submitted to the grievance department.

10. Further, there are no entries in the log book cross-referencing these grievances.

11. Specifically, the grievance dated which bears the date of March 3, 2012 with the log number "21" does not exist in our logbook as having been submitted to our grievance department.

12. In March of 2012, grievances received by the grievance department would begin with log number "6300" and proceed sequentially.

13. All inmates have access to blank grievance forms throughout the jail. Inmates are not prevented from taking blank forms with them when they are discharged from the jail.

14. Based on my knowledge and experience as the Grievance Coordinator at the Richmond City Jail, it is my conclusion that none of the grievances provided to me for review by Correct Care Solutions, were ever submitted or filed during his incarceration at the Richmond City Jail.

I swear or affirm that the foregoing statements are true to the best of my knowledge,
information and belief.

Dated this 25 day of September, 2014.

Daniell Goodall
Daniell Goodall
Grievance Coordinator

COMMONWEALTH OF VIRGINIA
City of Richmond

This day personally appeared before me, a notary public, Danielle Goodall, and made
oath that the foregoing is true and correct to the best of her knowledge, information and belief.

Given under my hand this 25th day of September, 2014.

Pamela Woody-Eaton
Notary Public

My commission expires: 4-30-2017

Richmond Sheriff's Office
Richmond City Jail



1701 Fairfield Way
Richmond, Virginia 23223
at Sheriff W. L. W. L.
Cul. Dr. M. S. L. and medical file

INMATE GRIEVANCE FORM

Date: 3-3-12 Assigned Housing Location: D3L Log Number: 21

Inmate's Name: SIR Thomas Inmate Number: 45120

Date Received: _____ Grievance Coordinator: _____

INSTRUCTIONS:

- ◆ Please print all information on the grievance form
- ◆ Only one grievance concern on each grievance form
- ◆ You will be notified in writing by the Grievance Coordinator of the action taken on your grievance concern within nine (9) working days of the receipt of your grievance by the grievance coordinator

In no way will the filing of this grievance effect your status in the jail, nor will there be any reprisal against you for filing this grievance. Grievances will not become a part of your classification file at the Richmond City Jail.

GRIEVANCE STATEMENT:

What Is Your Concern:

Since 10-12-11 I have written several grievances & Request forms that has gone unanswered or resolved. I am now as B3L and I was moved from B3L #12 to B3L #2. Around this time that the doctors was talking to the Inmate about the care that the medical Department was providing. I was put in isolation until the doctors that would be greater. Pending for the new jail had left that I was moved to high custody. My lawyer was told that it was because I was having my meds and pills, and what I had pending jail as well as Street Charges. I am upset because no one has ever changed me with anything, had and like to isolate me and not let me see the doctors or the jail had gone and that the medical Dept. was only showing my name but not my charges. What they said that to What Action Are You Requesting: my lawyer said I don't want pills, and I want to see the doctors and my meds and pills and my name was checked to see that one of the was not and ordered.

I am requesting a formal meeting with the Sheriff, and the medical Department and Dr. M. S. L. Because I don't think that anyone or Department should have that much power or be able to get away with it. Because of that Attorney Inmate Services said that I am not eligible for any program that I had was, and I have turned myself because of the lack of medical not getting meds and not getting my meds and pills. I am not getting my meds. This is a gross violation of the rights of the Dr. and the medical Department. I have turned my meds and pills, and I don't want to see the doctors, and my back is hurt. I think you should know.

Inmate Signature: _____

Date: 3-3-12



